

## UNITED STATES DISTRICT COURT

for the

District of Massachusetts

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

KIRBY VANCE BROWNING, PRO SE

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☒ No

REF COMMUNITY ALLIANCE  
 LAW OFFICE OF ALFRED A. GRAY, JR.  
 (SEE ATTACHED)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

# MOTION FOR APPOINTMENT OF COUNSEL

## COMPLAINT FOR A CIVIL CASE

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

KIRBY VANCE BROWNING, PRO SE

Street Address

401 FLINT AVENUE - APT # 216

City and County

ALBANY / DOUGHERTY COUNTY

State and Zip Code

GEORGIA / 31701-5002

Telephone Number

(229) 405-4937

E-mail Address

KIRBYVBROWNING@GMAIL.COM.

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name MICHAEL AMESJob or Title (if known) CEO + PRESIDENT, RFK COMMUNITY ALLIANCEStreet Address 971 MAIN STREETCity and County LANCASTER / WORCESTER COUNTYState and Zip Code MASSACHUSETTS / 01523Telephone Number (978) 365-7376

E-mail Address (if known) \_\_\_\_\_

## Defendant No. 2

Name DAVID LIBBYJob or Title (if known) CEO, RFK COMMUNITY ALLIANCEStreet Address 971 MAIN STREETCity and County LANCASTER / WORCESTER COUNTYState and Zip Code MASSACHUSETTS / 01523Telephone Number (978) 365-7376

E-mail Address (if known) \_\_\_\_\_

## Defendant No. 3

Name ALFRED A GRAY, JR.Job or Title (if known) LAWYERStreet Address 3 JILL CIRCLECity and County NORTH READING / ESSEX COUNTYState and Zip Code MASSACHUSETTS / 01864Telephone Number (617) 775-4220E-mail Address (if known) ALFGRAY0257@GMAIL.COM

## Defendant No. 4

Name \_\_\_\_\_

Job or Title (if known) \_\_\_\_\_

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address (if known) \_\_\_\_\_

## DEFENDANTS

1)

MICHAEL AMES  
CEO + PRESIDENT, RFK COMMUNITY ALLIANCE  
971 MAIN STREET  
LANCASTER / WORCESTER COUNTY  
MASSACHUSETTS 01523  
PH# (978) 365-7376  
EMAIL ADDRESS NOT KNOWN

2)

DAVID LIBBY  
CEO, RFK COMMUNITY ALLIANCE  
971 MAIN STREET  
LANCASTER / WORCESTER COUNTY  
MASSACHUSETTS 01523  
PH# (978) 365-7376  
EMAIL ADDRESS NOT KNOWN

3)

ALFRED A. GRAY, JR.  
LAWYER, OFFICE OF ALFRED A. GRAY, JR.  
3 JILL CIRCLE  
NORTH READING / ESSEX COUNTY  
MASSACHUSETTS 01864  
PH# (617) 775-4220  
EMAIL: ALFGRAY0257@GMAIL.COM

## b. If the defendant is a corporation

The defendant, (name) RFK COMMUNITY ALLIANCE is incorporated under the laws of the State of (name) MASSACHUSETTS, and has its principal place of business in the State of (name) MASSACHUSETTS.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

## 3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):

IN 1990, WHEN I RESIGNED FROM THE U.S. POSTAL SERVICE IN WESTCHESTER COUNTY, NEW YORK, I WAS EARNING \$15.00 PER HOUR. I WOULD OTHERWISE HAVE REMAINED WITH THE POSTAL SERVICE, HAVE RETIRED AROUND 2015. RFK COMMUNITY ALLIANCE OWES ME FOR BETWEEN 1990 + 2015 THE TOTAL AMOUNT THE \$15.00 PER HOUR I EARNED IN 1990 WOULD HAVE ACCUMULATED BY 2015

## III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

WITHOUT THE CLAIM I HAVE MADE, DUE TO PTSD FROM SEXUAL ABUSE I SUFFERED IN SEPTEMBER, 1964, I NOW LIVE IN POVERTY ON ONLY SSI + FOOD STAMPS. THE ABUSE WAS DONE BY DAVID C. PERKINS, THE THEN DIRECTOR OF THE THEN-PERKINS SCHOOL, NOW THE RFK COMMUNITY ALLIANCE. SAID ABUSE OCCURED AT THE SCHOOL'S SUMMER CAMP OCEANWARD IN FRIENDSHIP, MAINE.

I APPLIED FOR DAMAGES TO THE RFK ALLIANCE, BUT THEY + THEIR ATTORNEY, ALFRED A GRAY, JR., HAVE DENIED MY CLAIM.

## IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I ASK THE COURT TO ORDER RFK COMMUNITY ALLIANCE TO CEASE + DESIST DENIAL OF MY CLAIM FOR DAMAGES, WHICH CONTINUES AT THE PRESENT TIME, THE AMOUNTS CLAIMED ARE THE \$15.00 PER HOUR I WOULD HAVE STILL EARNED BETWEEN 1990 + 2015. I AM NOT GOOD AT MATH + SO AM UNABLE TO FIGURE OUT WHAT THE TOTAL AMOUNT OF DAMAGES WOULD BE. WITHOUT THE GRANTING OF DAMAGES, MY QUALITY OF LIFE IS COMPROMISED. IT SPEAKS TO POVERTY

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney** *I AM UNABLE TO AFFORD ONE,*

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 9 DECEMBER 2024 (SEE BELOW)

Signature of Plaintiff Kirby Vance Browning, PRO SE  
 Printed Name of Plaintiff KIRBY VANCE BROWNING, PRO SE

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_  
 Printed Name of Attorney \_\_\_\_\_  
 Bar Number \_\_\_\_\_  
 Name of Law Firm \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_  
 E-mail Address \_\_\_\_\_

DELAY INCURRED BETWEEN ABOVE DATE OF SIGNING + DATE OF MAILING OF THESE FORMS IS DUE TO LENGTH OF TIME IN SEEKING ASSISTANCE + ADVICE FROM MY BROTHER IN TEXAS + A FRIEND HERE IN ALBANY, GA. ALSO FROM PROCESS IN FILLING OUT THESE FORMS. I HAVE NO PRIOR EXPERIENCE IN NAVIGATING THIS FORM OF PROCESS.

I DEFEND WITH UTMOST VIGOUR MY CLAIM FOR FINANCIAL COMPENSATION. THIS IS AND REMAINS AN EXISTENTIAL MATTER THAT ~~ADVERSELY~~ AFFECTS MY QUALITY OF LIFE.

I NOW ASK THE RFK COMMUNITY ALLIANCE AND ITS LAWYER, MR. ALFRED GRAY, THIS:

1) WILL Y'ALL DO THE RIGHT AND HONOURABLE THING AND GRANT ME THE FINANCIAL COMPENSATION FOR THE SEXUAL ABUSE I ~~SUFFERED~~ ~~SUFFERED~~ ~~SUFFERED~~, WHICH COMPENSATION I RIGHTLY DESERVE AND NEED TO RECLAIM MY QUALITY OF LIFE? THIS WOULD BE MOST COMMENDABLE

OR

2) DO Y'ALL CONTINUE TO DELAY, STONEWALL AND DENY ME THE SAID COMPENSATION AND THUS RELEGATE MY REMAINING YEARS (FROM MY AGE OF 81) TO POVERTY AND LOSS OF MY QUALITY OF LIFE? IF Y'ALL DO THIS, IT WOULD BE MOST DISHONOURABLE - AND MAY THAT BE UPON YOUR HEADS.

I AWAIT YOUR RESPONSE TO THIS,

Kirby Browning

KIRBY BROWNING

P.S.

~~23~~ 23 DECEMBER 2024

I AM FURTHER INCENSED THIS DAY TO SEE ON MY COMPUTER A NEW YORK TIMES STORY ON VICTIMS OF SEXUAL ABUSE AT CATHOLIC-RUN BOYS' SCHOOLS IN IRELAND RELATING THEIR OWN STORIES OF TORMENT - ALMOST EXACTLY A CARBON COPY OF MY OWN ORdeal AT THAT SUMMER CAMP IN MAINE.

THIS ENTIRE ISSUE DEMANDS ACCOUNTABILITY THAT IS LONG OVERDUE.